

A.R.D.C. No. 6186356

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SHABOZ AKRAMOV, as Special)	
Administrator of the Estate of)	
UMEDJON AKRAMOV, deceased,)	
)	
Plaintiff,)	
)	
v.)	No: 22-cv-3851
)	
GEANTOS TRUCKING COMPANY ,)	
JOE VIAUD FLEURISCA,)	
)	
Defendants.)	

NOTICE OF REMOVAL

NOW COME the defendants, GEANTOS TRUCKING COMPANY and JOE VIAUD FLEURISCA , by and through their attorneys, MAISEL & ASSOCIATES, and pursuant to 28 USC §1441 and §1446, seek to remove this cause to the United States District Court for the Northern District of Illinois. In further support hereof, these defendants states as follows:

1. On May 19, 2022, there was commenced and now pending in the Circuit Court of Cook County, Illinois, a certain civil action under case number 2022 L 4507, in which the Plaintiff, SHABOZ AKRAMOV, as Special Administrator of the Estate of UMEDJON AKRAMOV, deceased, is seeking recovery under the Illinois Wrongful Death Act, 740 ILCS 180/2.1 for fatal injuries sustained by Umedjon Akramov as a result of a motor vehicle accident which occurred on January 15, 2022 in Chicago, Illinois.

2. The Plaintiff, Shaboz Akramov, is a citizen of the State of New York. The Defendant, Geantos Trucking Company, is a citizen of the State of Illinois. The Defendant, Joe Viaud Fleurisca, is a citizen of the state of Illinois.

3. The aforementioned lawsuit brought by the plaintiff seeks damages in excess of \$75,000.00.

4. These Defendants state that the lawsuit brought on behalf of Shaboz Akramov, as Special Administrator of the Estate of Umedjon Akramov, deceased, involves a controversy with complete diversity of citizenship between citizens of different states. These defendants affirmatively state that:

- a. The Plaintiff, Shaboz Akramov, was, at the commencement of this action, and is now, a citizen of the State of New York;
- b. The Defendant, Geantos Trucking Company, is a corporation duly created and organized under the laws of the State of Illinois and is a citizen of the State of Illinois;
- c. The defendant, Joe Viaud Fleurisca, was at the commencement of this action, and is now, a citizen of the State of Illinois and resides at 527 W. Gregory Avenue, Glendale Heights, Illinois.

5. Since this matter involves a controversy between an individual plaintiff who is a citizen of the State of New York, and a corporate defendant and an individual defendant, who are both citizens of the State of Illinois, these defendants request removal of this action from the Circuit Court of Cook County, Illinois to the United States District Court for the Northern District of Illinois, Eastern Division. Attached hereto and made a part hereof are copies of the following documents filed by the plaintiff and the defendant in the Circuit Court of Cook County, Illinois under case number 2022 L 4507:

- a. Plaintiff's Complaint at Law (Exhibit "A");

- b. Summons directed to Geantos Trucking and Joe Viaud Fleuresca (Group Exhibit “B”);
- c. Appearance and Jury Demand on behalf of Geantos Trucking Company and Joe Vaud Fleurisca (Exhibit “C”).

WHEREFORE, the defendants, GEANTOS TRUCKING COMPANY and JOE VIAUD FLEURISCA, pray that they may affect removal of this action from the Circuit Court of Cook County, Illinois to the United States District Court for the Northern District of Illinois, Eastern Division, and that this matter be tried before a jury.

Respectfully submitted,

MAISEL & ASSOCIATES

By: /s/Joseph J. Wilson

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